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HOWARD L. SOLLINS, SHAREHOLDER DIRECT DIAL: 410.862.1101 DIRECT FAX: 443.263.7569

E-MAIL ADDRESS: HSOLLINS@BAKERDONELSON.COM

August 1, 2017

#### **VIA HAND DELIVERY AND EMAIL**

Kevin McDonald, Chief Certificate of Need Division Maryland Health Care Commission 4160 Paterson Avenue Baltimore, Maryland 21215

Re: Adventist Home Health Services, Inc. - Frederick County

Matter No.: 17-R2-2397

Response to July 19, 2017 Completeness Questions

Dear Mr. McDonald:

On behalf of Adventist Home Health Services, Inc. ("AHHS"), we are hereby submitting the required four (4) copies of our responses to the May 24, 2017 completeness questions regarding the above-referenced project. We will also provide Word and electronic copies of our responses and exhibits as appropriate.

I hereby certify that a copy of this response has also been forwarded to the appropriate local health planning agency, as noted below.

If any further information is needed, please let us know.

Sincerely,

Howard L. Sollins

HLS/lam Enclosures

cc: Barbara Brookmyer, MD, MPH

Health Officer - Frederick County

cc: William D. Chan, Health Policy Analyst

Maryland Health Care Commission

Ms. Ruby Potter

Health Facilities Coordination Officer

Suellen Wideman, Esq.

Assistant Attorney General

Marta Harting, Esquire

Jonathan Montgomery, Esquire

Keith Ballenger, Vice President

Adventist Healthcare Home Care Services

Robert E. Jepson, Vice President/Business Development

Mr. Andrew L. Solberg

John J. Eller, Esquire

#### Adventist Home Health Services, Inc.

### Expansion of an Existing Home Health Agency (HHA license # 7048) to Frederick County Docket Number 17-R2-2397

Responses to Completeness Questions Received on 7/19/17

#### PART II - CONSISTENCY WITH REVIEW CRITRIA AT COMAR 10.24.01.08(3)

#### **Charity Care and Sliding Fee Scale**

1. Please provide documentation that Adventist Home Health Services published its Charity Care Policy in Anne Arundel, Calvert, Charles, Howard, Montgomery, Prince George's, and St. Mary's Counties, giving the name of the publication and the date this notice was last published.

An ad providing notice of Adventist Home Health Services' (AHHS) Charity Care and Sliding Fee Scale was placed in the Washington Post on April 29, 2017 and in the Baltimore Sun on May 31, 2017. The Washington Post and the Baltimore Sun reach all of our service areas throughout the state. Exhibit 10, attached, is the confirmation for both of these ads.

#### **Quality of Care**

2. Please contact the Office of Healthcare Quality and have the agency confirm in writing that Adventist Home Health Services is in good standing with the state.

The Letter of Good Standing from the Office of Health Care Quality is attached as Exhibit 11.

#### Table2A

3. To clarify, please provide an explanation for the overall 2.3 decrease in the number of total client visits (95,202 to 92,985) and the decrease in the number of visits for skilled nursing, home health aide, physical therapy, occupational therapy, and medical social services between 2016 and 2017. Conversely, please provide the assumptions for the significant 15.5 increase in total client visits between 2017 through 2018. The projected utilization numbers in Table 2B does not account for all of the increase between 2017 and 2018.

The AHHS fiscal year runs from January – December. The 2017 budget, including volume projections, was completed in October 2016 based upon actual Patient Admissions and Patient Visits through July 2016. AHHS ended 2016 with more admissions (7,928) and visits (95,202) than expected due to strong volumes in the second half of 2016.

The projected 15.2% increase from 2017 to 2018 is based upon two factors. First, the increase in service area with Frederick County will drive some volume increase. Second, AHHS originally used a calculation of 11.37 visits per admission for 2017 projections based upon experience in the first half of 2016. However, more recent experience has shown that a visit per admission ratio of 12.008 is more accurate and that was used to project volume in 2018. Indeed, the volume growth experienced by AHHS in the second half of 2016 has continued into the first part of 2017. Current projections show that based upon the volume in the first half of 2017, AHHS is anticipated to end the year with 110,000 patient visits, making the projection of 115,000 in 2018 eminently reasonable especially with the addition of services for patients in Frederick County.

#### **Exhibits**

- 10. Public Notice from Washington Post and Public Notice from Baltimore Sun
- 11. Letter of Good Standing
- 12. Affirmations

Size 44 Lines

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#### PROOF OF PUBLICATION

District of Columbia, ss., Personally appeared before me, a Notary Public in and for the said District, Alba Cortes well known to me to be BILLING SUPERVISOR of The Washington Post, a daily newspaper published in the City of Washington, District of Columbia, and making oath in due form of law that an advertisement containing the language annexed hereto was published in said newspaper on the dates mentioned in the certificate herein.

I Hereby Certify that the attached advertisement was published in The Washington Post, a daily newspaper, upon the following date(s) at a cost of \$547.72 and was circulated in the Washington metropolitan area.

| Published 1 time(s). Date(s):29  | of April 2017       | MORTON TIL   |
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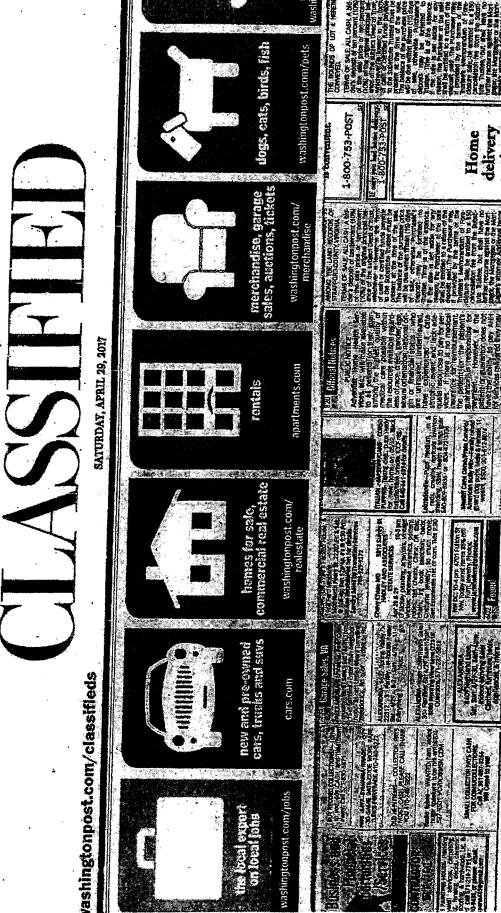
PUBLIC NOTICE Adventist Home Health Services, Inc., will make available to all patients (or their guarantors) the highest quality of medical care possible within the resources available regardless

of race, creed, gender, age, sexual orientation, national origin or financial status who are uninsured, underinsured, have experienced a catastrophic event and lack adequate resources to pay for services. If there is no medical insurance for reimbursement, the patient (or the patient's guarantor) is responsible for payment. However, if the patient or guarantor does not have the ability to pay AHH for services rendered they may apply for charity care, a sliding fee scale or time payments. Probable eligibility will be decided within two business days after receipt of the

application. The amount of assistance will be based on current Federal Income Poverty Guidelines.

Applications are available by calling: 1-800-506-1063 or on our website: http://www.adventisthealthcare.com/locations/adventist-home-care/about/#. WQDyikUrLcs[adventisthealthcare.com]

# The Washington Post



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501 N. Calvert St., P.O. Box 1377 Baltimore, Maryland 21278-0001 tel: 410/332-6000 800/829-8000

WE HEREBY CERTIFY, that the annexed advertisement of Order No 4992841

#### Sold To:

Adventist HealthCare - CU00602604 820 W Diamond Ave Ste 600 Gaithersburg,MD 20878-1469

#### Bill To:

Adventist HealthCare - CU00602604 820 W Diamond Ave Ste 600 Gaithersburg,MD 20878-1469

Was published in "The Baltimore Sun", "Daily", a newspaper printed and published in Baltimore City on the following dates:

May 31, 2017

| Subscribed and sworn to before me this | The Baltimore Sun Media Group  By Maria Evand  day of May 2017, |
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#### Exhibit 11 Letter of Good Standing



## STATE OF MARYLAND

#### Maryland Department of Health and Mental Hygiene Office of Health Care Quality

Spring Grove Center • Bland Bryant Building
55 Wade Avenue • Catonsville, Maryland 21228-4663

Larry Hogan, Governor - Boyd K. Rutherford, Lt. Governor - Dennis R. Schrader, Secretary

July 27, 2017

Keith Ballenger, Administrator Adventist Healthcare Home Care Services 12041 Bournefield Way, Suite B Silver Spring, MD 20904

Dear Mr. Ballenger:

As of this date and the past 12 months our records have no indications of Adventist Home Health Services license #HH7032 being out of compliance. Therefore your agency is in Good standing with the Office of Health Care Quality.

If you have any questions please contact our office at (410)402-8038.

Sincerely,

Roslyn Tyson

**Program Coordinator** 

#### Exhibit 12 Affirmations

#### Exhibit 12 Affirmations

Keith Ballenger
Keith Ballenger

Vice President,

Adventist HealthCare Home Care Services

Linda Beth Berman

Manager, Grants Management Department

Luda Bert Cermen

Adventist HealthCare

7/31/17

Date

Robert E. Jepson

Vice President, Business Development

Adventist HealthCare Washington Adventist Hospital

Greg Roof

Director of Finance

Adventist HealthCare Home Care Services